

RGGI Model Rule Discussion

Next Steps for Modeling and Program Design

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ENE Model Rule Outline

- Goal: stimulate discussion that feeds into the modeling process and final rule design
- Purpose: create a framework and design that makes sense and propose some starting targets for modeling and discussion (cap levels, allocation, offsets, etc)
- Next Steps: Meetings with environmental groups, regulators, and companies to explain our thinking and identify differences of opinion and areas of common ground



Key Policy Issues for ENE

Program Goal: a policy and program with real environmental benefits and integrity that is replicable and expandable, but which delivers the benefits at a relatively low economic cost to the states

Key Policy Issues:

- □ Cap Level & Design
- Allowance Apportionment & Allocation
- □ Flexibility Mechanisms & Offsets



Cap Level & Design

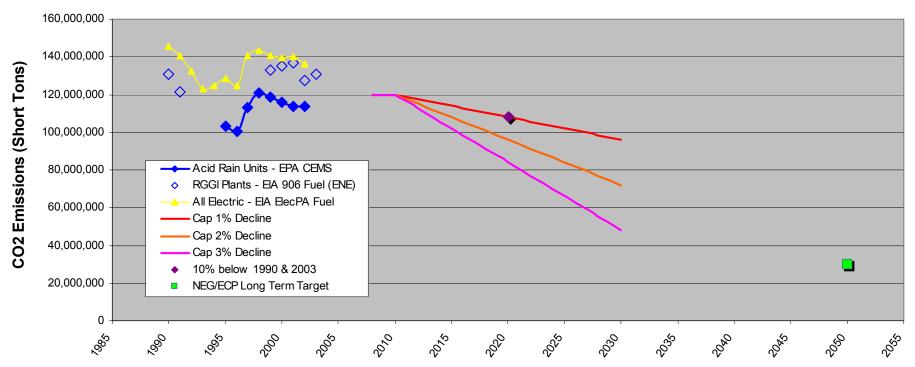
- Target: 25% reduction in emissions from today's levels by 2020
- Starting Point: cap should begin at average emissions from 2000-4 (collect new data)
- Regular Decline: The cap should decline every two years to achieve the 2020 target
- Circuit Breaker: a circuit breaker mechanism should be considered that would delay the cap decline if average allowance prices exceed \$30/ton CO₂



Cap Level & Design

Figure 1: Historical Emissions & Reduction Trajectories
Regional Greenhouse Gas Initiative

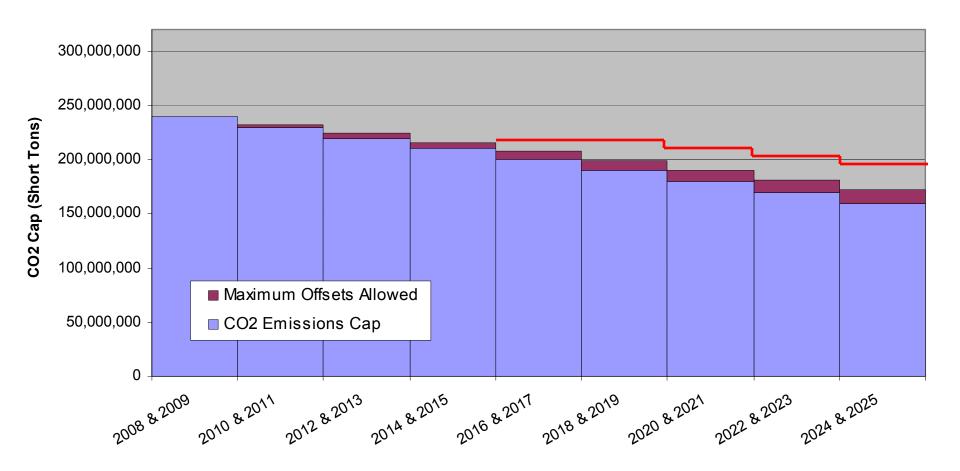




Cap Level & Design

Figure 2: Proposed CO₂ Cap Levels with Time Regional Greenhouse Gas Initiative





Apportionment & Allocation

- Initially the allowances should be distributed equally (50/50) between consumers and generators
- Consumer Allocation: Keep the total cost of the program low by investing in energy efficiency (no load growth) and the clean energy technologies of tomorrow
 - Lower or zero load growth will keep the cost of the program low and allow us to achieve real reductions
- Fossil generators should receive allowances on an output basis with updating



Flexibility Mechanisms

- Banking unlimited
- Borrowing none
- Limited Offset Program
 - Our focus is on the process and the criteria not project types
 - Environmental integrity
 - Limited offset quantity most emissions reductions from the regulated entities
 - Within the RGGI region
 - Regional rule and pre-approval body



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